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Attach:

Subject: VERIFICATION THAT VESSELS ARE CONDUCTING STEERING TESTS AS  
REQUIRED BY 33 CFR 164.25

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1. I HAVE RECEIVED SEVERAL QUESTIONS REGARDING THE INTENT OF CAPTAIN  
CALHOUN'S LETTER 16600 TO D8 MSO CO'S DATED 5 JUNE 1995.

2. IT WAS NOT HIS INTENT TO LAUNCH A NEW VESSEL BOARDING INITIATIVE. HE WAS  
SIMPLY STIMULATING THOUGHT AND COMMUNICATION AT THE CO LEVEL.

3. IT IS NOT OUR INTENT THAT UNITS BOARD VESSELS TO CHECK THEIR PERFORMANCE  
OF THESE TESTS. THESE ITEMS SHOULD BE CHECKED DURING ALL PORT STATE CONTROL  
BOARDINGS ON VESSELS TO WHICH THE SUBJECT REGULATIONS APPLY.

G.A.T.

U.S. Department  
of Transportation  
  
United States  
Coast Guard



Commander  
Eighth Coast Guard District  
Hale Boggs Federal Building

501 Magazine St.  
New Orleans, LA 70130-  
Staff Symbol: m  
Phone: (504) 589-6

16600  
5 June 1995

From: Commander, Eighth Coast Guard District  
To: Distribution

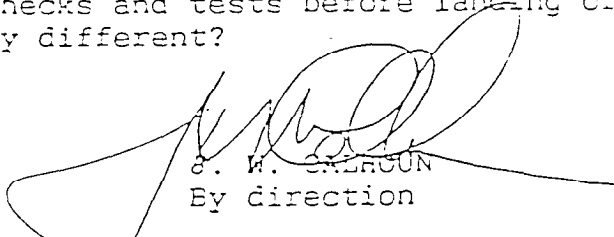
Subj: POWER LOSSES AND STEERING FAILURES

1. As you well know, we continue to experience problems with main propulsion and steering failures on deep draft vessels departing and entering port. I believe a good number of vessels are not performing the required tests and checks of 33 CFR 164.25, particularly those entering.

2. I'm considering a two step approach - first, remind operators, through agents, of the required checks. The enclosed notice would do that. After giving them time to spread the word, start conducting "at sea" boardings and dockside boardings for vessels entering and departing. If we find "gun decking" of logs, unfamiliarity with the regulations, or simple failure to take action, then initiate appropriate measures. Educate first, then strongly enforce.

3. As always, resources are scarce but we now have the latitude to divert manpower according to risk. One option may be to temporarily shift from some port state control work to these boardings.

4. Please discuss this concept with your people and either call me or E-mail. If need be, we can set up a conference call. I doubt anyone would like to fly with an airline pilot who didn't perform the required checks and tests before landing or takeoff. Why should ships be any different?

  
S. W. GREGG  
By direction

Encl: (1) Notice to Ship Operators and Owners  
(2) 33 CFR 164.25

Dist: All Eighth District District MSC COs

TO SHIP OPERATORS AND OWNERS

All ship operators and owners are reminded of the requirements of 33 Code of Federal Regulations (CFR) Part 164.25, "Tests before entering or getting underway," and of 33 CFR 160.215 "Notice of Hazardous Conditions."

33 CFR 164.25 requires tests and drills before entering or getting underway on the navigable waters of the United States. These tests and drills involve steering gear, emergency power, main propulsion, and control communications.

"Before entering... the navigable waters of the United States" means prior to entering the territorial sea (three miles).

"Before... getting underway on the navigable waters of the United States" means effectively prior to getting underway from any port or anchorage in United States waters.

The tests must be conducted no more than 12 hours before entering or getting underway.

33 CFR 160.215 requires that the Captain of the Port be notified whenever there is a hazardous condition on board a vessel.

By 33 CFR 160.203, "hazardous condition" means any condition that could adversely affect the safety of the vessel, including "damage." "Damage" includes a malfunction or reduced capacity of any of the following:

- a) main engine, reduction gear, shafting or propeller
- b) air starting equipment
- c) engine maneuvering and control equipment
- d) steering machinery
- e) vital electrical generating machinery
- f) primary electrical system
- e) vital control and maneuvering communications equipment

Failure to comply with these regulations may result in a civil penalty of up to \$25,000 or criminal penalty which is considered committing a class D felony.

A copy of these regulations is attached.

Vessels operating on both the open and confined waters within the Eighth Coast Guard District continue to experience steering and main propulsion failures. These failures pose a threat to the vessel itself, other traffic, to shoreside facilities, and to the environment.

§164.25 Tests before entering or getting underway.

(a) Except as provided in paragraphs (b) and (c) of this section no person may cause a vessel to enter into or get underway on the navigable waters of the United States unless no more than 12 hours before entering or getting underway, the following equipment has been tested:

(1) Primary and secondary steering gear. The test procedure includes a visual inspection of the steering gear and its connecting linkage, and, where applicable, the operation of the following:

(i) Each remote steering gear control system.

(ii) Each steering position located on the navigating bridge.

(iii) The main steering gear from the alternative power supply, if installed.

(iv) Each rudder angle indicator in relation to the actual position of the rudder.

(v) Each remote steering gear control system power failure alarm.

(vi) Each remote steering gear power unit failure alarm.

(vii) The full movement of the rudder to the required capabilities of the steering gear.

(2) All internal vessel control communications and vessel control alarms.

(3) Standby or emergency generator, for as long as necessary to show proper functioning, including steady state temperature and pressure readings.

(4) Storage batteries for emergency lighting and power systems in vessel

control and propulsion machinery spaces.

(5) Main propulsion machinery, ahead and astern.

(b) Vessels navigating on the Great Lakes and their connecting and tributary waters, having once completed the test requirements of this subpart, are considered to remain in compliance until arriving at the next port of call on the Great Lakes.

(c) Vessels entering the Great Lakes from the St. Lawrence Seaway are considered to be in compliance with this sub-part if the required tests are conducted preparatory to or during the passage of the St. Lawrence Seaway or within one hour of passing Wolfe Island.

(d) No vessel may enter, or be operated on the navigable waters of the United States unless the emergency steering drill described below has been conducted within 48 hours prior to entry and logged in the vessel logbook, unless the drill is conducted and logged on a regular basis at least once every three months. This drill must include at a minimum the following:

(1) Operation of the main steering gear from within the steering gear compartment.

(2) Operation of the means of communications between the navigating bridge and the steering compartment.

(3) Operation of the alternative power supply for the steering gear if the vessel is so equipped.

(92 Stat. 1471 (33 U.S.C. 1221 et seq.); 49 CFR 1.46(n)(4))

[CGD 77-183, 45 FR 16925, Mar. 24, 1980, as amended by CGD 83-004, 49 FR 43466, Oct. 23, 1984]

§160.215 Notice of hazardous conditions.

Whenever there is a hazardous condition on board a vessel, the owner, master, agent or person in charge shall immediately notify the Captain of the Port of the port or place of destination and the Captain of the Port of the port or place in which the vessel is located of the hazardous condition.